

1 Robert C. Ryan (#7164)  
2 Timothy A. Lukas (#4678)  
3 Tamara Reid (#9840)  
4 HOLLAND & HART LLP  
5 5441 Kietzke Lane, Second Floor  
6 Reno, Nevada 89511  
7 Phone: (775) 327-3042  
8 Fax: (775) 786-6179  
9 rryan@hollandhart.com  
10 treid@hollandhart.com  
11 Christopher B. Hadley  
12 (Admitted *pro hac vice*)  
13 JONES, WALDO, HOLBROOK & McDONOUGH, PC  
14 1441 West Ute Blvd., Suite 330  
15 Park City, Utah 84098  
16 Telephone: (435) 200-0087  
17 Facsimile: (435) 200-0084  
18 chadley@joneswaldo.com

19 *Attorneys for Plaintiff and Counter Defendants*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

29 CHEMEON SURFACE TECHNOLOGY, LLC, a  
30 Nevada limited liability company,

31 Plaintiff,

32 v.

33 METALAST INTERNATIONAL, INC., a Nevada  
34 corporation; METALAST, INC., a Nevada  
35 corporation; SIERRA DORADO, INC., a Nevada  
36 corporation; DAVID M. SEMAS, an individual;  
37 GREG D. SEMAS, an individual; and WENDI  
38 SEMAS-FAURIA, an individual.

39 Defendants.

40 Case No.: 3:15-cv-00294-MMD-VPC

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**STIPULATION AND ORDER FOR**  
**EXTENSION OF TIME TO FILE**  
**RESPONSE TO GREG SEMAS'S**  
**RENEWED MOTION FOR SUMMARY**  
**JUDGMENT [DKT 427]**

48  
**[FIRST REQUEST]**

49 DAVID M. SEMAS; and METALAST  
50 INTERNATIONAL, INC.,

51 Counterclaimants,

52 v.

53 CHEMEON SURFACE TECHNOLOGY, LLC,  
54 DEAN S. MEILING; and MADYLON  
55 MEILING,

56 Counter Defendants.

1 CHEMEON SURFACE TECHNOLOGY, LLC, a  
2 Nevada limited liability company,

3 Plaintiff,

4 v.

5 MHA GROUP, a company; and MARC HARRIS,  
6 an individual.

7 Defendants.

8 Consolidated with:

9 Case No. 3:15-cv-00295-MMD-VPC

10 Plaintiff CHEMEON Surface Technology (“CHEMEON”), by and through its undersigned  
11 counsel, Timothy A. Lukas of Holland & Hart, LLP; and Defendant Greg Semas (“Semas”), by and  
12 through his undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate  
13 and agree as follows:

14 1. On July 25, 2018, Semas filed a Renewed Motion for Summary Judgment (Dkt. 427)  
15 (“Motion”).

16 2. Chemeon’s deadline to file a response to the Motion is currently August 15, 2017.

17 3. Chemeon and Semas hereby stipulate to extend the deadline for Chemeon to respond  
18 to the Motion to September 7, 2018.

19 4. This is Chemeon’s first request for an extension of time to file a response to the  
20 Motion.

21 5. Pursuant to LR IA 6-1, this first request for an extension is made with good cause  
22 and in good faith and not for purposes of delay. Because of the unavailability of Chemeon’s counsel  
23 during periods of August, it would be very difficult and impose an undue burden on their client and  
24 counsel to meet the current filing deadline for filing an opposition to Greg Semas’ renewed motion  
25 for summary judgment in this case. Counsel do not believe that the short extension requested would  
26 cause any undue delay in this case. Chemeon’s counsel believes the extension allows for a better  
27 and more complete resolution of the pending motion and claims that may ultimately have to be tried  
28 to the Court.

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1 IT IS SO STIPULATED.

2 DATED this 9th day of August, 2018.

3 HOLLAND & HART LLP

4 /s/ Timothy A. Lukas

5 Robert C. Ryan (7164)

6 Timothy A. Lukas (#4678)

7 Tamara Reid (9840)

8 5441 Kietzke Lane, Second Floor

9 Reno, Nevada 89511

10 *Attorneys for Chemeon Surface Technology*

11 DATED this 9th day of August, 2018.

12 HOY CRISSINGER KIMMEL PC

13 /s/ Michael D. Hoy

14 Michael D. Hoy (2723)

15 Bank of America Tower

16 50 West Liberty Street, Suite 840

17 Reno, Nevada 89501

18 Telephone: (775) 786-8000

19 Facsimile: (775) 786-7426

20 *Attorneys for Greg D. Semas*

21 **IT IS SO ORDERED.**

22   
**UNITED STATES DISTRICT JUDGE**

23 DATED: August 9, 2018

24 **HOLLAND & HART LLP**  
5441 Kietzke Lane, 2nd Floor  
25 Reno, NV 89511  
26 Phone: (775) 327-3000 • Fax: (775) 786-6179

## PROOF OF SERVICE

Pursuant to FRCP 5, I declare, as follows:

I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

I am readily familiar with Holland & Hart's practice for collection and processing of: HAND DELIVERIES, FACSIMILES and OUTGOING MAIL. Such practice in the ordinary course of business provides for the delivery or faxing and/or mailing with the United States Postal Service, to occur on the same day the document is collected and processed.

On August 9, 2018, I served the foregoing, **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO GREG SEMAS'S RENEWED MOTION FOR SUMMARY JUDGMENT [DKT 427] [FIRST REQUEST]**, as follows:

ELECTRONIC: by electronic transmission through the United States District Court's CM/ECF system to the parties below:

Michael D. Hoy  
HOY CRISSINGER KIMMEL  
Bank of America Tower  
50 West Liberty Street, Suite 840  
Reno, Nevada 89501  
Telephone: (775) 786-8000  
Facsimile: (775) 786-7426  
[mhoy@nevadalaw.com](mailto:mhoy@nevadalaw.com)

### *Attorneys for Defendants*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on August 9, 2018.

*/s/ Jeanette Sparks*

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